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March 16, 2005

BY FACSIMILE AND FIRST CLASS MAIL

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Re *ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al.*,
Civil Action No. 04-10353 PBS
Our File 2639/509

Dear Paul:

Thank you for agreeing to meet with us tomorrow afternoon concerning outstanding discovery matters. In advance of our discovery conference tomorrow, I propose a path forward with respect to limited trade secrets discovery as suggested by Judge Saris at today's hearing.

At the hearing, Judge Saris suggested that the parties attempt to reach an agreement on a somewhat narrowed scope of trade secrets discovery and suggested that Voice Signal produce all documents indicating the work that Messrs. Gillick, Roth, Yamron and Grabherr (the "individual defendants") did for Voice Signal for a period of one year following the commencement of their employment with Voice Signal.

ScanSoft maintains that it is entitled to full and complete discovery on its trade secrets claims, especially given the particularity with which it has identified the subjects of the trade secrets at issue in both the Amended Complaint and in ScanSoft's answers to Voice Signal's second set of interrogatories. However, the narrowed scope of discovery Judge Saris suggested would at least allow ScanSoft to move forward with the scheduling of the depositions of the individual defendants.

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As you know, the discovery process in this case has been greatly delayed. To the extent Judge Saris's proposal would move discovery forward, even to a limited degree, ScanSoft is interested in pursuing this approach.

Very truly yours,



Lisa M. Fleming

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